



U.S. Department of Justice

United States Attorney
 Southern District of New York

86 Chambers Street
 New York, New York 10007

MEMO ENDORSED

July 20, 2025

USDC SDNY
 DOCUMENT
 ELECTRONICALLY FILED
 DOC#: _____
 DATE FILED: 7/22/2025

BY ECF

The Honorable Andrew L. Carter, Jr.
 United States District Judge
 40 Foley Square
 New York, NY 10007

Re: *National Job Corps Association et al. v. Dept. of Labor et al.*, No. 25 Civ. 04641 (ALC)

Dear Judge Carter:

This Office represents defendants, the U.S. Department of Labor and Lori Chavez-DeRemer, in her official capacity as Secretary of Labor. We write in response to that aspect of the Court's order of July 14, ECF No. 68, directing the parties to meet and confer regarding a schedule for next steps in this litigation in advance of next week's hearing.

The parties have already begun to meet and confer regarding the future of this action, as directed by the Court. Defendants respectfully propose that the parties be allowed to provide their respective views on the litigation schedule two weeks after the Court issues its ruling on the scope of the preliminary injunction following next week's conference, as the Court's ruling may affect the parties' views about how to proceed in this case (including the possibility of settlement). For their part, Plaintiffs respectfully propose that the parties provide the Court with a proposed schedule by August 1, and provide any proposed amendments to that schedule within two weeks of the Court's ruling on the scope of the preliminary injunction.

Defendants also respectfully ask the Court to extend their time to respond to the complaint until after the Court has set a schedule for further proceedings (which will set a deadline for such a response—for example, by permitting the Government to combine its anticipated motion to dismiss this case with a motion for summary judgment). Plaintiffs do not object to this request.

The parties will be prepared to discuss these matters at the upcoming conference. We thank the Court for its attention to these matters.

Respectfully,

JAY CLAYTON
 United States Attorney

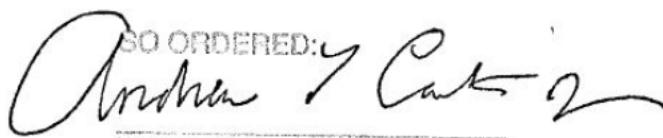
By: /s/ Jean-David Barnea
 JEAN DAVID BARNEA
 DOMINIKA TARCYNSKA
 Assistant United States Attorneys

86 Chambers Street, Third Floor
New York, NY 10007
Tel: (212) 637-2679/2748
jean-david.barnea@usdoj.gov
dominika.tarczynska@usdoj.gov

Cc: Plaintiffs' counsel (by ECF)

Defendants' request for an extension of time to answer or otherwise respond to the Complaint is hereby GRANTED. To the extent Defendants intend to move to dismiss the Complaint and/or for summary judgment, they are required to first seek a pre-motion conference as outlined in this Court's Individual Practices.

The Parties shall submit a proposed schedule to the Court by August 1, 2025.


SO ORDERED:
Andrew L. Carter, Jr.
HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE

July 22, 2025